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15 *Attorneys for Plaintiffs Modern Eminence LLC,*
16 *Modern Fortress, Inc. and AllRealms Inc.*

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 MODERN EMINENCE, LLC, MODERN
20 FORTRESS, INC., AND ALLREALMS,
INC.

Case No.: 2:24-cv-00348-CDS-EJY

21 Plaintiffs,
22 **JOINT MOTION AND ORDER TO**
23 **EXTEND DEADLINE TO SUBMIT**
24 **DISCOVERY PLAN AND PROPOSED**
25 **SCHEUDLING ORDER**

vs.

NATHAN PARK

Defendant.

1 Plaintiffs Modern Eminence LLC, Modern Fortress, Inc., and AllRealms, Inc.
2 (“Plaintiffs”), by and through their counsel of record, Payne Keinarth, Esq. with the law firm of
3 Dickinson Wright PLLC, and Defendant Nathan Park (“Park”) by and through his counsel of
4 record, Jarrod L. Rickard, Esq. and Katie L. Cannata, Esq. with the law firm of Semenza Rickard
5 Law, (together, the “Parties”) hereby jointly request an extension of time to submit their
6 discovery plan and proposed scheduling order for the following reasons:

7 Due to conflicts in schedules around the July 4th holiday, the parties have not yet been
8 able to confer regarding the likely needs of discovery in the case. They will be able to do so on
9 or before July 9, 2024. As such, the parties respectfully request that the Court grant this motion
10 to extend their deadline to file a discovery plan and proposed scheduling order until July 17,
11 2024.

12 This is the first such request filed with this Court, and it is made in good faith and is not
13 made for the purpose of delay. The Parties agree that good cause exists for this continuance.

14 DATED this 3rd day of July, 2024
15
16 DICKINSON WRIGHT PLLC

17 /s/ Payne Keinarth
18 Payne Keinarth (Texas Bar No. 24101412)
(Admitted Pro Hac Vice)
19 607 W. 3rd Street, Suite 2500
Austin, TX 78701

20 Attorney for Plaintiffs

DATED this 3rd day of July, 2024

SEMENZA RICKARD LAW

17 /s/ Jarrod L. Rickard
18 Jarrod L. Rickard, Esq., Bar No. 10203
Katie L. Cannata, Esq., Bar No. 14848
19 10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145

20 Attorneys for Defendant Nathan Park

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1 **ORDER**
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3 IT IS SO ORDERED.
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7 UNITED STATES MAGISTRATE JUDGE
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9 DATED: July 3, 2024
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